

LAW OFFICES  
GOLDBERG, GODLES, WIENER & WRIGHT  
1229 NINETEENTH STREET, N.W.  
WASHINGTON, D.C. 20036

EX PARTE OR LATE FILED

HENRY GOLDBERG  
JOSEPH A. GODLES  
JONATHAN L. WIENER  
HENRIETTA WRIGHT  
MARY J. DENT  
DANIEL S. GOLDBERG  
W. KENNETH FERREE  
THOMAS G. GHERARDI, P.C.  
COUNSEL

(202) 429-4900  
TELECOPIER:  
(202) 429-4912

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December 7, 1994

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DEC - 7 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

BY HAND

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: Ex Parte Presentation in PR Docket 93-61

Dear Mr. Secretary:

Forwarded herewith are two copies, in accordance with §1.1206 of the Commission's rules, of a letter addressed to Chairman Reed E. Hunt, setting forth Part 15 Coalition concerns regarding the resolution of the above proceeding.

If there are any questions in this regard, please contact the undersigned.

Sincerely,

  
Henrietta Wright

cc: Chairman Reed E. Hundt

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BY HAND

Chairman Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Docket No. 93-61

Dear Chairman Hundt:

The purpose of this letter is to set the record straight as to the Part 15 Coalition's position on testing AVM/LMS systems and Part 15 technologies. As you know, members of the Part 15 Coalition have for over a year advocated testing. The Part 15 companies first focused on testing to refute the claim of the multilateration AVM providers that there would be no significant degree of interference between their systems's reverse links and Part 15 service. When the AVM companies dropped that claim, we called for testing to determine ways to enhance compatibility between Part 15 technologies and AVM systems.

After a year of having our requests for comprehensive tests rebuffed by Teletrac and others, the engineering representatives of the four multilateration AVM systems met with representatives of the Part 15 Coalition to discuss tests that could be accomplished in a short time frame to assist the Commission in its decision making. Given the time constraints, we believed that there should be one comprehensive test, rather than a series of partial tests. A test date of December 3-4 was picked, with a commitment to compile the data as quickly as possible in order to submit it to the FCC soon after January 1. However, when it became clear that the tests would not be comprehensive, we were not prepared to proceed.

There are at least two significant interference issues posed by the Commission's proposal in this proceeding — *i.e.*, the interference potential of Pinpoint's and Uniplex's wideband forward links to Part 15 devices, and the potential of Part 15 devices to interfere with AVM/LMS reverse links. There are also other, related, issues posed by the FCC staff's suggestion to segment the 902-928 MHz band and to employ interference thresholds in certain portions of the band. The test proposed for December 3-4, however,

would have examined only the wideband forward link issue. The reason for this gap in what was to be tested was that three of the four AVM systems, Teletrac, Mobilvision, and Southwestern Bell Mobile Systems were not prepared to test their equipment at all. Teletrac and Southwestern Bell were planning, however, to monitor the test and, perhaps, extrapolate the Pinpoint test results to their own systems.

The Part 15 Coalition was, moreover, particularly concerned when it became apparent that Pinpoint was urging the Commission to defer the wideband forward link portion of the decision in this proceeding in order to await the results of this partial testing. While we believe that the complete results of comprehensive tests would benefit the Commission, we are opposed to the Commission's making a partial decision while awaiting partial test results.

The Part 15 Coalition respectfully requests, therefore, that if the FCC sees any merit to including testing information in its decision, it encourage comprehensive testing, and await those results.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Henrietta Wright", with a stylized flourish at the end.

Henrietta Wright  
Attorney for Part 15 Coalition